

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD)	
)	
and)	
)	
ALISON DREITH,)	
)	
<i>on behalf of themselves and a class of</i>)	
<i>similarly situated individuals,</i>)	
)	
Plaintiffs,)	
)	
v.)	
)	Case No.: 4:17-CV-2455 RLW
CITY OF ST. LOUIS, MISSOURI,)	
)	
Defendant.)	

AFFIDAVIT OF TONY RICE

I, Tony Rice, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. I am a resident of St. Louis County.
3. I participated in peaceful protests after the acquittal of Officer Stockley.
4. On the evening of Sunday, September 17, 2017, I was biking downtown after protesting. There was no ongoing organized protest, but people were still gathered in small groups in and around the intersection of Tucker and Washington Avenues.
5. I saw protestors, bystanders, and pedestrians, mostly on sidewalks and in the medians.
6. The streets had already been closed off by police vehicles.

7. There were many police officers in and around the intersection of Tucker and Washington in full riot gear and carrying full-body shields and batons. I would estimate there were more than one hundred police officers.

8. At approximately 11:20 p.m., I was riding on my bike in the intersection of Tucker and Washington Avenues.

9. I heard no warning or instruction from the police at that intersection.

10. The police riot lines closed in at me and everyone else in that intersection from all sides, leaving no routes of egress even via the sidewalk. The police were wearing helmets and personal protective equipment.

11. The police officers shouted, "GET DOWN, GET DOWN, GET DOWN."

12. There were different commands from different police officers; they were not all consistent.

13. Some police said "GET DOWN ON YOUR KNEES."

14. I immediately laid my bike down and complied with the directive to get down to my knees.

15. Police officers deployed chemical agents against me and the other people caught in the intersection.

16. It burned my skin like nothing I have never felt.

17. There was no room to go down any farther because the police officers were squeezing in on me and the other people in the intersection.

18. Because I thought I needed to get down farther to comply with the police officers' directives, I laid down on top of my bike.

19. Police officers then knelt on top of me and hit me in the back with the point of a baton.

20. I was knocked firmly into my bike, my throat was pressed against a metal pole of my bike, and I could not breathe.

21. A police officer sprayed me with chemical agents directly at my head.

22. I was sprayed with a chemical agent so much that the substance flowed down my head, my shoulder, and my arm, and made my skin so slippery that police could not handcuff me right away.

23. A different police officer eventually got me some water to reduce the amount of pain I was in from the pepper spray.

24. Eventually I was handcuffed, arrested, and transported to the Justice Center.

25. I could not see for a long while.

26. I did not throw anything at the police at any time.

27. I never resisted arrest.

28. I was unarmed.

29. I never threatened the police or anyone else.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on 9/22/17

Tony Rice
Tony Rice

Subscribed and sworn to before me this 22nd day of September 2017, by Tony Rice.

Kathryn M. Hinnert-Mueller
Notary Public



KATHRYN M. HINNERS-MUELLER
My Commission Expires
May 12, 2018
St. Louis City
Commission #14614956